28

1	Anthony L. Martin		
2	Nevada Bar No. 8177 anthony.martin@ogletreedeakins.com		
3	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.		
	10801 W. Charleston Blvd.,		
4	Suite 500 Las Vegas, NV 89135		
5	Telephone: 702.369.6800		
6	Fax: 702.369.6888		
7	Attorneys for Defendants Buzhukov Payroll LLC, Spiegelworld Buzhukov LLC, and Spiegelworld Holding Company LLC.		
8			
9	UNITED STATES DISTRICT COURT		
10	FOR THE DISTRICT OF NEVADA		
11	DANIEL W. HIGGINBOTHAM, individually And On Behalf Of All Others Similarly	Case No.: 2:23-cv-00498-JAD-BNW	
12	Situated,		
13	Plaintiff,	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO	
	·	PLAINTIFF'S COMPLAINT	
14	VS.	(FIRST REQUEST)	
15	BUZHUKOV PAYROLL LLC, SPIEGELWORLD BUZHUKOV LLC, and		
16	SPIEGELWORLD HOLDING COMPANY		
17	LLC,		
18	Defendants.		
19	Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Daniel W. Higginbotham ("Plaintiff")		
20	and Defendant Spiegelworld Holding Company LLC ("Defendant") [incorrectly identified as		
21	Buzhukov Payroll LLC, Spiegelworld Buzhukov LLC, and Spiegelworld Holding Company LLC], by		
22	and through their respective counsel of record, hereby request and stipulate to extend the time for		
23	Defendant to respond to Plaintiff's Complaint (ECF No. 1). Defendant's response to Plaintiff's		
24	Complaint is currently due May 1, 2023 (21 days from service date of April 8, 2023 is April 29,		
25	2023, a Saturday). The parties request a twenty-eight (28) day extension of time up to and including		
26	May 29, 2023 in which to respond as Defense counsel has just been retained in this case. This is the		
27	parties' first request for an extension of time.		

## Case 2:23-cv-00498-JAD-BNW Document 7 Filed 04/28/23 Page 2 of 2

	1	This Stipulation is made in good faith and is not intended for purposes of delay.		
	2	DATED this 27th day of April, 2023.	DATED this 27th day of April, 2023.	
	3	KIND LAW	OGLETREE, DEAKINS, NASH, SMOAK & STEWART,	
	4		P.C.	
	5	/s/ Michael Kind Michael Kind	/s/ Anthony L. Martin Anthony L. Martin	
	6	Nevada Bar No. 13903	Nevada Bar No. 8177	
	7	8860 S. Maryland Parkway, Suite 106 Las Vegas, NV 89123	10801 W. Charleston Blvd., Suite 500	
	8	Attorneys for Plaintiff	Las Vegas, NV 89135	
	9	inomeys for 1 ming	Attorneys for Defendants	
บ่	10		<u>ORDER</u>	
ŗ.	11	IT IS SO ORDERED.		
STEWART, P.C	12	II IS SO ORDERED.	HALLE CTATES MACISTRATE HIDGE	
ay .	13		UNITED STATES MAGISTRATE JUDGE	
H, SMOAK & RLESTON BLVD. E SOO , NV 89135 702.369.6800	14		DATED:	
H, ARLE TE SC S, NA 702	15			
9 6	16			
DEAKINS, 10801 LA	17			
_ •	18			
OGLETREE	19			
ŏ	20			
	21			
	22			
	23			
	24			
	25			
	26			
	27			
	28			